

Remarks

Claims 1-41 are currently pending and stand rejected. Claims 6, 7, 15, 16, 25, 36, and 40 have been amended. Applicants assert that the claims are now in condition for allowance as set forth more fully below.

Claim Objections

Claims 6, 7, 15, 16 and 25 have been amended to correct the spelling of updateable to updatable. As such the objections can now be withdrawn.

103 Rejections

Claims 1-2, 4, 6, 8, 10-11, 13, 15, 17, 19, 22, 24-26, 28-32, 34, 36-38 and 40-41 stand rejected under 35 USC §103(a) as being unpatentable over Morris (US Pat. 5,813,017) in view of Adamchick (US Pat. 5,761,668). Claims 3, 5, 7, 9, 12, 14, 16, 18, 21, 23, 27-30, 33, 35 and 39 stand rejected as being unpatentable over Morris in view of Official Notice. Applicants respectfully traverse these rejections.

Claims 1-2, 4, 6, 8, 10-11, 13, 15, 17, 19, 22, 24-26, 28-32, 34, 36-38 and 40-41

The Office Action asserts that the referenced claims are unpatentable under Morris in view of Adamchick. The Office Action asserts that Morris teaches all of the recited elements of independent claims 1, 10, 19, 31, 36, 37, 40, and 41 with the exception that the validation includes checking whether a date specified in the data is in a valid format based on the number of digits that represent the year and further includes whether the date falls within a set range of dates. The Office Action further asserts that Adamchick cures the cited deficiency of Morris.

However, applicants assert that independent claims 1, 10, 19, 31, 36, 37, 40, and 41 each contain additional similar elements not disclosed by Morris, Adamchick or a combination thereof. As a representative example independent claim 1 recites,

“A client-server computer system... returns to the same client application server that generated the validation request an indication of valid or invalid based on whether the initial form matches the particular form... and a storage mass coupled to said application server for storing a system of dynamically maintainable validation functions for performing said validation service...”.

Such a recitation is contrary to Morris. Morris teaches a system that compares a changed file at a client with an original backup file stored on an application server whereby only the changed portion of the changed file is (i.e. a Delta) is stored at the application server. (Abstract; Col 6, l. 35-67). Morris does not disclose a process of validation by returning to the same client application server that generated the validation request an indication of “valid” or “invalid” format based on whether the initial form matches the particular form using dynamically maintained validation functions.

The Office Action appears to be equating the creation of a delta difference file that resides at the application server in Morris to the “indication of validity” being returned to the client as recited in the claims. A backup delta file is merely a data subset. It is not being validated, just identified and backed up. Furthermore, there does not appear to be any “indication of validity” being sent to the client after the back up of the delta is complete. In other words, mere differencing and backing up is not validation.

Adamchick addresses the Y2K problem of extending the date used by the internal clock of a computer from 1999 to the year 2000 by converting every date in a computer database to a “Millenium” format using a Julian date. Adamchick is nonanalogous art in that it does not concern itself with a client validating information supplied by a central server or checking whether a date specified in the data is in a valid format based on the number of digits that represent the year and further includes checking whether the date falls within a set range of dates and therefore does not cure the additional deficiencies of Morris, above. Adamchick merely a conversion device that converts the format of all dates in a computer based on an algorithm. As the Year 2000 had not yet arrived, there was no need to check for validity since all date formats were invalid for use after December 31, 1999.

As such, Morris fails to disclose elements in addition to those asserted to be cured by Adamchick and therefore the combination of Morris and Adamchick fails to disclose all of the elements of the claim recitations as asserted in the Office Action. Further Adamchick Therefore independent claims 1, 10, 19, 31, 36, 37, 40 and 41 are patentable over Kirkwood ‘662 in view of Adamchick for at least this reason. Dependent claims 2-8, 11-18, 20, 30, 33-35 and 38-39 depend from one of allowable independent claims 1, 10, 19, 31, 36, 37, 40, and 41 and are allowable for at least this same reason.

Claims 3, 5, 7, 9, 12, 14, 16, 18, 21, 23, 27-30, 33, 35 and 39

As discussed above in regards to claims 1-2, 4, 6, 8, 10-11, 13, 15, 17, 19, 22, 24-26, 28-32, 34, 36-38 and 40-41, dependent claims 3, 5, 7, 9, 12, 14, 16, 18, 21, 23, 27-30, 33, 35 and 39 depend from one of allowable independent claims 1, 10, 19, 31, 36, 37, 40, and 41. Each dependent claim contains all of the elements of their respective allowable independent claim and are allowable for at least the same reason.

Furthermore, Morris in combination with Official Notice, fails to teach or disclose all of the elements recited in any of the independent claims 1, 10, 19, 31, 36, 37, 40, or 41. Morris does not suggest or provide explicit or implicit motivation to represent the data schema via LDAP. A reference must provide an explicit or implicit suggestion, teaching or motivation in order to be §103 prior art. (See, *In Re Dembiczak*, 175 F.3d 994, 50 U.S.P.Q.2D (BNA) 1614 (Fed. Cir. 1999) (Placing a pumpkin face on an orange trashbag not obvious under 35USC §103 without finding of suggestion, teaching or motivation in the reference); *SIBIA Neurosciences, Inc. v. Cadus Pharm. Corp.*, 225 F.3d 1349, 55 U.S.P.Q.2D (BNA) 1927 (Fed. Cir. 2000) (Suggestion or motivation to modify a single reference required for obviousness rejection). Furthermore, an argument based on the theory that “it was obvious to try” fails as an obviousness rejection. *In re Fine*, 837 F.2d 1071, U.S.P.Q.2D 1596 (Fed. Cir 1988). Applicant’s respectfully request a copy of the references that suggest or motivate the integration of LDAP to modify Kirkwood ‘017 that results in the functionality of the recited claims. Those teachings must also have a reasonable chance at success (See, *Brown & Williamson Tobacco Corp. v. Phillip Morris, Inc.*, 229 F.3d 1120, 56 U.S.P.Q.2D (BNA) 1456 (Fed. Cir. 2000)).

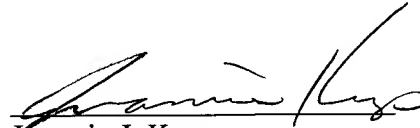
Conclusion

Applicants assert that the application including claims 1-41 is now in condition for allowance. Applicants request reconsideration in view of the amendments and remarks above and further request that a Notice of Allowability be provided. Should the Examiner have any questions, please contact the undersigned.

No fees beyond the fee for continued examination are believed due. However, please charge any additional fees or credit any overpayment to Deposit Account No. 50-3025.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read "Jeramie J. Keys", written over a horizontal line.

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